



From the desk of:
James M. Kramer, Esq.

VIA ECF

Hon. Valerie Figueredo
 Daniel Patrick Moynihan
 United States Courthouse
 500 Pearl Street
 New York, NY 10007-1312

SO ORDERED

VALERIE FIGUEREDO

United States Magistrate Judge

Dated: 1-17-2023

The parties are directed to submit a joint letter updating the Court on the status of the expert deposition schedule by February 28, 2023.

Re. Gref v. Am. Int'l Indus., et al., 20-cv-05589

Dear Judge Figueredo,

Plaintiff writes in accord with the Court's directive that the parties provide a joint update on the status of the expert deposition schedule in this matter.

With respect to Plaintiff's expert, Dr. William Longo, Plaintiff had requested a date as soon as possible this month for his continued deposition. He unfortunately has no availability in January, but can be available for deposition on Friday, February 3, his next soonest available date. Plaintiff has communicated this to counsel for Defendants, who have confirmed that they will be noticing the deposition.

Regarding Defendant American International Industries' expert, Dr. Allan Feingold, AII has offered Dr. Feingold for his continuation deposition on January 18, 2023 from 1:00 p.m. to 5:00 p.m. (ET) and January 19, 2023 from 1:00 p.m. to 2:00 p.m. (ET). This morning, AII also offered Mickey Gunter for deposition on February 16, 2023 at 12:00 p.m. (ET), and Alan Segrave on February 21, 2023 at 9:00 a.m. (ET). AII advised Plaintiff that both Mr. Gunter's and Mr. Segrave's depositions are subject to the completion of Dr. Longo's deposition.

Plaintiff currently awaits deposition dates from Defendants for the remaining defense experts.

As always, we stand ready to provide additional information or answer any questions the Court may have.

Respectfully yours,

James M. Kramer

cc: All Counsel of Record (via ECF)

We stand for our clients.

HEADQUARTERS

One Court Street
 Alton, IL 62002
 TEL: (618) 259-2222
 FAX: (618) 259-2251

NEW YORK

112 Madison Avenue
 New York, NY 10016
 TEL: (212) 784-6400
 FAX: (212) 213-5949

CHICAGO

230 W. Monroe
 Suite 2221
 Chicago, IL 60606
 TEL: (312) 759-7500
 FAX: (312) 759-7516

SAN FRANCISCO

455 Market
 Suite 1150
 San Francisco, CA 94105
 TEL: (415) 536-3986
 FAX: (415) 537-4120

LOS ANGELES

100 N. Sepulveda Blvd.
 Suite 1350
 El Segundo, CA 90245
 TEL: (310) 322-3555
 FAX: (310) 322-3655

ST. LOUIS

231 S. Bemiston
 Suite 525
 St. Louis, MO 63105
 TEL: (800) 479-9533